

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

Plaintiff,

v.

CHATTANOOGA NEWS CHRONICLE,
THEHUFFINGTONPOST, INC.,
REPRESENTATIVE STEVE COHEN,
US DOMINION, INC., DOMINION VOTING
SYSTEMS, INC., DOMINION VOTING
SYSTEMS CORPORATION, MEDIA
MATTERS FOR AMERICA, OHIO
INTELLIGENCE TIPS, ROSS ELDER,
and ALI ABDUL RAZAQ AKBAR A/K/A
ALI ALEXANDER,

Defendants.

Civil Action No. 1:21-cv-317

**DOMINION’S CERTIFICATION OF COMPLIANCE WITH COURT’S ORDER
GOVERNING MOTIONS TO DISMISS**

Pursuant to the Court’s Order Governing Motions to Dismiss dated December 27, 2021 (Dkt. No. 7), the undersigned counsel for Defendants U.S. Dominion, Inc., Dominion Voting Systems, Inc., and Dominion Voting Systems Corporation (collectively, “Dominion”) certifies that he met and conferred with counsel for Plaintiff Terpsehore Maras (“Plaintiff”) and made a good faith effort to determine whether Dominion’s Motion to Dismiss could be avoided or whether Plaintiff’s deficient pleading could be cured by an amendment. Unfortunately, after exchanging lengthy emails, the parties were unable to reach an agreement, thereby necessitating the Motion to Dismiss.

Respectfully submitted,

/s/ W. Scott Sims

W. Scott Sims (#17563)
Michael R. O' Neill (#34982)
SIMS|FUNK, PLC
3322 West End Ave., #200
Nashville, TN 37203
(615) 292-9335
(615) 649-8565
ssims@simsfunk.com
moneill@simsfunk.com

Counsel for Dominion Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2022, a copy of the foregoing was filed via the Court's CM/ECF system which will send notice of this filing via electronic mail notice to the following:

Russell A. Newman The Newman Law Firm 6688 Nolensville Road Suite 108-22 Brentwood, TN 37027 russell@thenewmanlawfirm.com	Todd Tatelman Sarah Clouse United States House of Representatives, General Counsel 219 Cannon House Office Building Washington, DC 20515 202-225-9700 todd.tatelman@mail.house.gov sarah.clouse@mail.house.gov
Douglas N. Letter Office of General Counsel U.S. House of Representatives 5140 O'Neill House Office Building Washington, D.C. 20515 (202) 225-9700 Douglas.Letter@mail.house.gov	Robb S Harvey Waller, Lansden, Dortch & Davis, LLP (Nashville) Nashville City Center 511 Union Street Suite 2700 Nashville, TN 37219-8966 615-244-6380 615-244-6804 (fax) robb.harvey@wallerlaw.com

And sent via U.S. Mail to the following:

MEDIA MATTERS FOR AMERICA 75 Broadway Street, Suite 202 San Francisco, CA 94111	ALI ABDUL RAZAQ AKBAR A/K/A ALI ALEXANDER 5125 Pinellas Avenue Keller, TX 76244
---	--

/s/ W. Scott Sims
W. Scott Sims